

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

1:18-CV-24227-CMA-Altonaga

JASON MILLER,)
)
)
Plaintiff,)
)
)
vs.)
)
GIZMODO MEDIA GROUP, LLC,)
a Delaware Corporation, KATHERINE)
KRUEGER, individually, and WILL)
MENAKER, individually,)
)
Defendants.)

**UNOPPOSED MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Elizabeth A. McNamara of the law firm of Davis Wright Tremaine LLP, 1251 Avenue of the Americas, 21st Floor, New York, New York 10020, (212) 489-8230, for purposes of appearance as co-counsel on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger in the above-styled case only, and pursuant to Section 2B of the CM/ECF Administrative Procedures, to permit Elizabeth McNamara to receive electronic filings in this case, and in support thereof states as follows:

1. Elizabeth McNamara is not admitted to practice in the Southern District of Florida and is a member in good standing of the State of New York. Attached hereto is a certificate of good standing from the Clerk of the Appellate Division of the New York Supreme Court, Third Department.

2. Movant, Deanna K. Shullman, Esquire, of the law firm of Shullman Fugate PLLC, 2101 Vista Parkway, Suite 4006, West Palm Beach, Florida 33411, (561) 429-3619, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as the member of the Bar of this Court with whom opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Elizabeth McNamara has made payment of this Court's \$75.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Elizabeth McNamara, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Elizabeth McNamara at the e-mail address: LizMcNamara@dwt.com.

WHEREFORE, Deanna K. Shullman moves this Court to enter an Order for Elizabeth McNamara to appear before this Court on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Elizabeth McNamara.

Date: December 10, 2018

Respectfully submitted,
/s/ Deanna K. Shullman
Deanna K. Shullman
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*Attorneys for Defendants Gizmodo Media Group
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Defendants.)

CERTIFICATION OF ELIZABETH McNAMARA

Elizabeth McNamara, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of the State of New York Bar.



Elizabeth McNamara

Case No. 1:18-cv-24227-Altonaga

CERTIFICATION PURSUANT TO S.D. FLA. L.R. 7.1(a)(3)

Defendants' undersigned counsel, Deanna K. Shullman, hereby certifies that counsel for Defendants has conferred with counsel for Plaintiff and they have consented to the filing of this motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear *Pro Hac Vice*, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filings was served by CM/ECF on December 10, 2018 on all counsel or parties of record on the service list.

/s/ Deanna K. Shullman
Deanna K. Shullman

Case No. 1:18-cv-24227-Altonaga

SERVICE LIST

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*State of New York
Supreme Court, Appellate Division
Third Judicial Department*

I, Robert D. Mayberger, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that

Elizabeth Anne McNamara

having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 16th day of February, 1982, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.

*In Witness Whereof, I have hereunto set my hand
and affixed the Seal of said Court, at the
City of Albany, this 6th day of December, 2018.*



Robert D Mayberger

Clerk

UNITED STATES DISTRICT COURT
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Defendants.)

**[PROPOSED] ORDER GRANTING MOTION TO APPEAR
PRO HAC VICE, CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing for Elizabeth McNamara (the “Motion”), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Elizabeth McNamara may appear and participate in this action on behalf of defendants Gizmodo Media Group, LLC and Katherine Krueger. The Clerk shall provide electronic notification of all electronic filings to Elizabeth McNamara at lizmcnamara@dwt.com.

DONE AND ORDERED in Chambers at _____, Florida, this
____ day of _____, 2018.

Hon. Cecilia Altonaga
United States District Judge

Copies furnished to:
All Counsel of Records